



April 24, 2017

Delaware Public Service Commission  
c/o Joseph DeLosa ([joseph.delosa@state.de.us](mailto:joseph.delosa@state.de.us))  
861 Silver Lake Boulevard, Suite 100  
Dover, DE 19904

Re: PSC Regulation Docket No. 56  
Consideration of Application for Approval of 2016 Program for Procurement of Solar Renewable Energy Credits

Dear Commissioners,

I am writing on behalf of the Delaware Solar Energy Coalition (DSEC), an organization which represents the interests of the solar community – installers, manufacturers, and system owners. DSEC represents the solar community on the Renewable Energy Task Force.

We support the Draft Regulations as it correctly does not step into the area of directing DNREC's decision making on implementing a cost cap to the RPS.

Furthermore, the Qualified Fuel Cell Provider (QFCP) costs should only be included in the Cost Cap Calculation when fueled with renewable energy, and should only be included in the Cost Cap Calculation for Photovoltaics if being fueled by solar power. When operating on natural gas or other fossil fuels, that cost should not be included.

Also, existing SREC Supply Contracts should remain in force if an RPS freeze is implemented. A freeze only stops the advance of the RPS. It does not cause a rollback. Delmarva Power continues to purchase SRECs annually as current contracts do not completely fulfill SREC compliance requirements. Keeping existing contracts in force would not result in excess SRECs being purchased during a freeze period. Delmarva would likely still need to purchase spot market SRECs to maintain compliance at the frozen RPS level.

We appreciate the opportunity to respond regarding the RPS Cost Cap Calculations. We would be pleased to provide further comments and answer questions the Commissioners or staff may have. Thank you for the work you do on behalf of the consumers of Delaware and your commitment to public service.

Warm Regards,

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